

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Gerasimos Stefanitsis,

Debtor.

Chapter 11

Case No.: 22-22507-shl

**DEBTOR'S APPLICATION FOR ENTRY OF ORDER EXTENDING TIME
TO FILE SCHEDULES AND OTHER DOCUMENTS**

TO: THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE:

Gerasimos Stefanitsis, (the “Debtor”), by his attorney, Lawrence F. Morrison, Esq., hereby submits this application (“Application”) seeking entry of an order pursuant to Rule 1007 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”) extending the time of the Debtor to file his Attorney Disclosure Statement, Chapter 11 Income Form 122B, Declaration of Schedules, Schedules A/B, C, D, E/F, G, H, I, and J, Statement of Financial Affairs, Summary of Assets and Liabilities, and other missing documents (collectively, “Missing Documents”), a copy of which order (“Proposed Order”) is annexed hereto as **Exhibit “A”**:

INTRODUCTION

1. This Application is submitted in support of the Debtor’s Application for an Order Extending the time within which the Debtor must file its Missing Schedules pursuant to Rule 1007(c) of Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”).
2. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 1334 and 157(b). This is a “core” proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (M) and (O).

3. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

4. On August 1, 2022 the Debtor filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. The Debtor was initially to file its Chapter 11 Schedules and other documents by August 15, 2022.

RELIEF REQUESTED

6. This Application seeks entry of an Order extending the deadline for the Debtor to file its Missing Schedules, pursuant to 11 U.S.C. 1116(3), through August 29, 2022.

7. Counsel to the Debtor conferred with the Debtor to go over the missing information required to complete the Schedules and anticipated filing the schedules on or before August 15, 2022. However, the Debtor needs more time to gather information from their tax professional, therefore the Debtor was unable to complete its schedules by August 15, 2022. Accordingly, they require a short, two-week extension, and we are requesting through August 29, 2022, to be sure the schedules are filed timely. The Debtor seeks this additional time to, pursuant to 1116(3) of the Bankruptcy Code and Rule 1007(c) of the Bankruptcy Rules, which will provide the Debtor time to compile, finalize and file the Missing Documents.

8. This is the first request for the relief sought herein.

WHEREFORE, the Debtor respectfully requests that the Court enter the proposed Order extending time for the Debtor to file the Missing Schedules and Other Documents to **August 29, 2022** and grant the Debtor such other and further relief as is just and proper.

Dated: New York, New York
August 15, 2022

Respectfully Submitted,

By: 

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